

**Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, DC 20554**

In the Matter of	)	
	)	
Review of the Commission's Part 95 Personal Radio Services Rules	)	WT Docket No. 10-119
	)	
1998 Biennial Regulatory Review – 47 C.F.R. Part 90 – Private Land Mobile Radio Services	)	WT Docket No. 98-182 RM-9222
	)	
Petition for Rulemaking of Garmin International, Inc.	)	RM-10762
	)	
Petition for Rulemaking of Omnitronics, L.L.C.	)	RM-10844

**COMMENTS OF MYGMRS.COM ON THE  
PEITITON FOR RULEMAKING TO REVISE THE PERSONAL COMMUNICATION  
SERVICE RULES**

myGMRS.com (hereinafter referred to as "myGMRS"), pursuant to the Commission's Rules and Regulations, 47 C.F.R. (1995), respectfully submits these Comments to the Commission's Notice of Proposed Rule Making in the above captioned Docket No. 10-119, Review of the Commission's Part 95 Personal Radio Services Rules (the "NPRM").

**BACKGROUND**

myGMRS is a non-profit website created in late-2006 which serves the GMRS community by providing a listing of repeaters across the United States and its territories. myGMRS also has an online forum where licensed users may come together to share information in a friendly environment. A valid GMRS license is required in order to register for the website which gains access to certain features. By restricting access to the website, sensitive information about repeaters such as location and frequency can be hidden to unlicensed visitors to the website. Due to the high instances of abuse of repeaters, many repeater owners are reluctant to share

information about their system online. myGMRS provides a minimal layer of protection by securing this data from potential abusive parties.

From late-2006 until mid-2010, myGMRS has 1,750 registered licensed users and 392 repeaters voluntarily listed by their owners. 42 U.S. states plus Puerto Rico are covered by myGMRS. While this sounds miniscule, myGMRS is the largest, most up-to-date, comprehensive repeater directory online and represents the majority of licensed GMRS users who have any interest in repeater systems.

### **GMRS LICENSEE SURVEY**

Upon the release of the Notice of Proposed Rule Making, myGMRS set out to create a short survey which could be taken by GMRS licensees to voice their opinions without having to write formal comments to the Commission. We asked questions relating to the proposed changes and questions posed by the Commission and are very pleased with the results. Included with this comment is a copy of the latest survey results, containing 370 responses, taken at 10:00 PM EST on September 2, 2010. We hope the Commission takes these results into consideration along with formal comments submitted already.

We have included the original form and a summary of responses as graphical charts. The survey was conducted using the Google Docs service. The full survey results are available as a spreadsheet upon request. Due to the number of responses we must omit them from this filing.

## **DISCUSSION**

### **A. GENERAL MOBILE RADIO SERVICE**

#### **1. Station Licensing**

The Commission proposes to license GMRS stations by rule, removing the requirement to obtain a valid station authorization (license), and removing the station identification requirement.

myGMRS proposes that the license requirement should be dropped for all handheld stations operating below 2 watts ERP. Handheld stations exceeding 2 watts ERP and other station classes should maintain the current license requirements and station identification. Should the Commission decide to license all classes by rule, myGMRS strongly urges the Commission to require a license for repeater stations as these systems have the greatest chance for causing and receiving interference. Stations which transmit through a repeater station would therefore not need a license. myGMRS proposes that only one repeater license should be sufficient for multiple repeater systems, just as an individual GMRS license is sufficient under the current rules.

Given the multifaceted nature of GMRS, station licensing and identification particularly for repeater, base, and mobile stations is paramount to keeping interference to an absolute minimum. Being that there is not coordinating body for GMRS stations, sometimes the only way for stations to coordinate among themselves is to listen for the station identification of co-channel users. Then a dialog can begin to mitigate potential interference.

The Commission also proposes to extend the license term of station authorizations from 5 years to 10 years. myGMRS supports this proposal and would propose a reduction in license fees. We understand that by doubling the license term the license fees would likely also double from \$85.00 to \$170.00. We feel that forcing individuals to pay \$170.00 up front places an undue burden upon them. Lowering the cost of the license will lessen the burden considerably. Even so, we feel that the benefits of a 10-year license term outweigh the cost burden and we therefore support the proposed change.

## **2. Eligibility**

The Commission proposes to eliminate the age requirement for obtaining a station authorization. myGMRS more or less agrees with the Commission. However, we believe that if an age requirement remains, the age should be lowered from 18 years to 13 years.

The Commission seeks comment on removing the prohibition on business usage of the GMRS service. myGMRS strongly urges the Commission to uphold the current prohibition. Business entities from large corporations to small businesses are all eligible for Part 90 Business and Industrial Pool licenses. Whether they require an FRS-like shared channel or an exclusive high-power channel, they already have access to radio spectrum. Allowing businesses to use GMRS frequencies is going to cause further interference and prevent personal communications from occurring. As a Personal Radio Service, GMRS needs to be kept free of business communications except where allowed by the current rules. Permitting business entities to use GMRS spectrum would put an undue burden on individual and family users.

### **3. GMRS Portable Devices**

The Commission proposes to restrict the power level of portable GMRS devices to 2 watts ERP to conform to the GMRS service rules in Canada. myGMRS opposes this change. We believe that there is no reason to mandate power restrictions and fail to see the benefits offered by the Commission. The vast majority of portable devices are the consumer-grade FRS/GMRS combination radios with fixed antennas and low power output. These radios rarely exceed 1.5 watts ERP on GMRS channels and virtually never exceed 2 watts ERP. The manufacturers of these radios are conscious of the power restriction in Canada and design their equipment accordingly so it will be fully legal in the jurisdictions of the FCC and IC (Industry Canada). Changing the current rules will not cause any savings to manufacturers because the majority of them are limiting their radios voluntarily already. This places a burden on licensed users who already have equipment that operates above 2 watts ERP. Furthermore, this would likely result in a prohibition on external antennas of portable devices. Even at 2 watts, a handheld radio fitted with a proper external antenna (whether directional or not) can significantly increase its operating range without relying on high RF power levels. We strongly oppose this proposal.

The Commission is seeking comments on restricting the power level of other GMRS station classes and/or imposing antenna height limitations on these stations. myGMRS

feels that this is going to severely limit the usefulness of GMRS systems and would be detrimental to the service as a whole. FRS already has similar limitations and because of those limitations many people have chosen GMRS for its better range and performance. The limitations imposed by FRS are due to technical reasons: to prevent interference to the adjacent GMRS channels. The current power and antenna height restrictions work well and therefore should not be changed.

Also requested is commentary on whether repeater stations should continue to be permitted on GMRS. myGMRS is understandably biased in this regard, but nonetheless we see no benefit to dropping repeater stations from the service. Repeater stations are an invaluable asset to a large percentage of GMRS licensed users. Living on the East Coast of the United States, it's easy to suppose that cellular carriers adequately meet the needs of most if not all GMRS users. In reality, this couldn't be further from the truth. The United States is a massive country with the majority being remote or having unforgiving terrain from the perspective of radio signals. Even with the state-of-the-art cellular towers which pepper the country, good solid signal is hard to come by if you leave major populated areas. Even my home state of New Jersey, the densest state in the country, has vast stretches of little-to-no cellular coverage. In the South, there is the infamous Pine Barrens which have few roads and towns and therefore few cell towers. In the North, there are the mountains of Hunterdon and Sussex County which make it hard to provide adequate coverage for everyone. The rest of the country is far, far worse. In some areas, radio is the only method of reliable communication. Individuals and families need GMRS to prove a short-medium range communications solution which cell phone companies simply cannot provide.

The Commission is also seeking comments on simplifying the Small Base Station power level calculation from ERP to TPO (Transmitter Power Output). We agree with this proposal and support it wholeheartedly. By doing this, directional gain antennas may be used which can allow for lower TPO power levels if the signal can be directed to its destination without maximum power.

#### **4. Narrowbanding GMRS Channels**

The Commission proposes to implement 12.5 kHz narrowbanding of the current 25 kHz GMRS channels. myGMRS sees little benefit in narrowbanding GMRS as proposed. The benefit claimed by the Commission is that 12.5 kHz would foster better spectrum efficiency. In reality, however, no extra spectrum will ever be freed up by this change. The only thing that will change is that FRS and GMRS stations will overlap a little less when they are operating in close proximity to one another. We feel that this is not a justifiable reason to prohibit the importation and sale of wideband equipment and to eventually prohibit all 25 kHz operation on the band. Many of the licensees which do not use off-the-shelf FRS/GMRS combination radios use PLMR-grade radios either new or second-hand. As the Commission has mandated that the PLMR services transition to narrowband operation, the used market is being flooded with decommissioned equipment from PLMR systems that are not 12.5 kHz capable. Due to the high costs associated with equipment of this type, especially repeater systems, cutting off this source of affordable equipment will place a burden on licensed users.

Alternatively, myGMRS proposes that 12.5 and 6.25 kHz narrowband digital voice emissions be permitted on GMRS. Due to the strong correlation between GMRS and the PLMR equipment, it makes a great deal of sense to allow these new technologies and set rules for how to best implement them without causing harm to the service. Digital emissions are specifically prohibited by the current rules and we fail to see a good reason for that, given that digital voice transmissions are now possible. When the current rules were drafted, it's conceivable that digital voice was not on the "radar scope" of those making the rules. Back then, digital emissions basically meant paging or telemetry data which has no place on GMRS. We hope that the Commission will seek out the possibility of allowing digital voice emissions utilizing such technologies as APCO P25, NXDN (NEXEDGE/iDAS), MOTOTRBO, etc. which all can be made to work well with the spirit of GMRS as long as the rules are spelled out properly.

#### **5. Section 95.29(g)**

myGMRS has no comment on this subsection and defers to the opinions and expertise of those affected by this rule part.

**6. Garmin International, Inc. Petition for Rulemaking**

myGMRS declines to comment on this subsection but requests that the Commission consider the results of the survey included as part of this comment for a sampling of how GMRS users feel overall. We have no particular comment in support or in opposition of the petition as long as it does not violate the wishes of the Public.

Respectfully submitted,

MYGMRS.COM

By: \_\_\_\_\_  
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Owner/Founder

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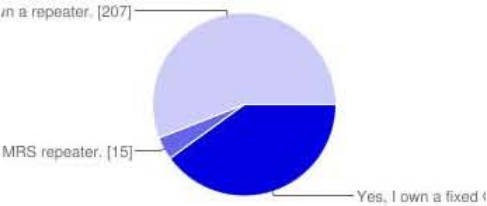
September 2, 2010

370 responses

Summary [See complete responses](#)

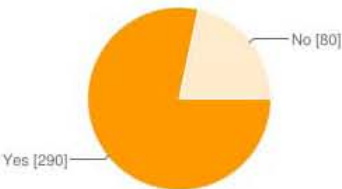
Your GMRS Callsign  
WQKF356 WPRV616 WQGA299 WQHE326 WQGS754 WQFU865 WQFR972 WQLQ491 wqjx245 WQEY203 WQJR557 wqlr767 WC

Do you own a GMRS repeater?



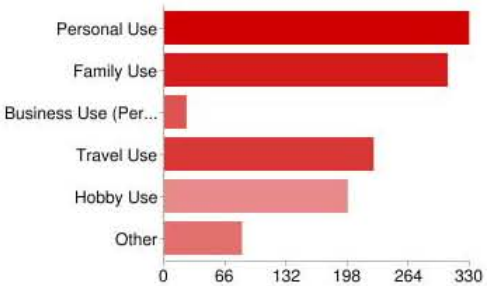
Yes, I own a fixed GMRS repeater.	148	40%
Yes, I own a mobile GMRS repeater.	15	4%
No, I do not own a repeater.	207	56%

Do you use any other GMRS repeaters?



Yes	290	78%
No	80	22%

For which purposes do you use GMRS?

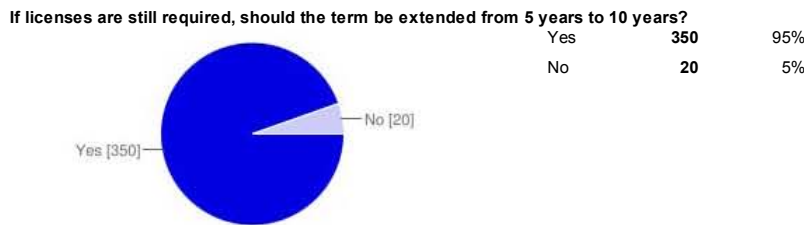
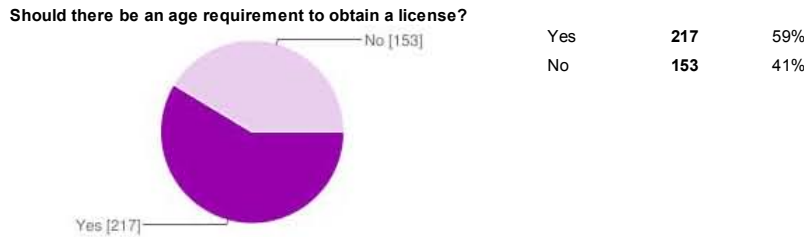
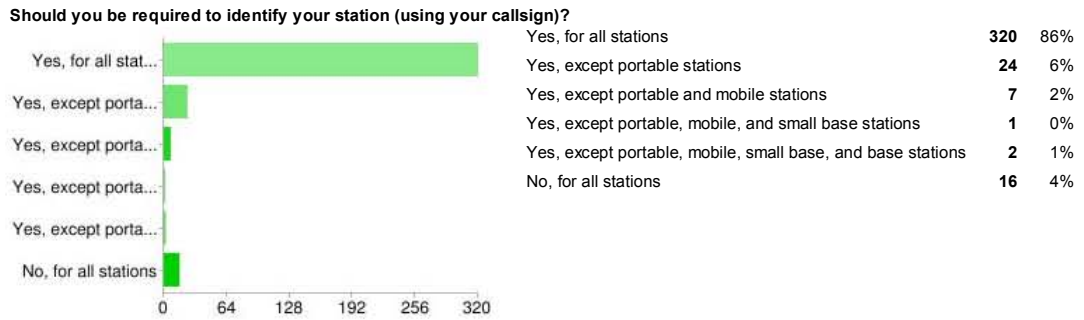
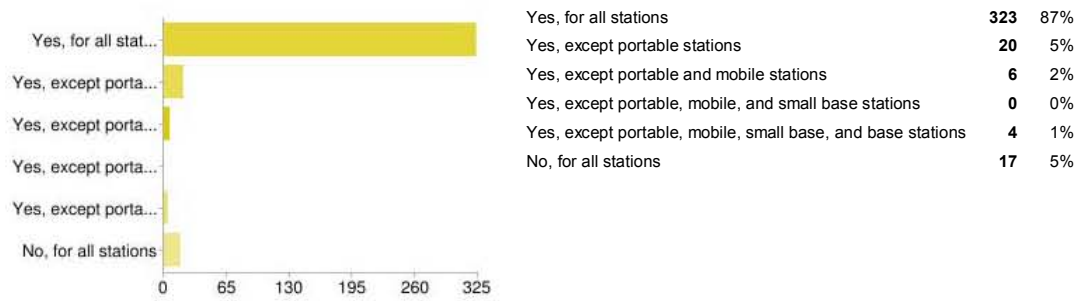


Personal Use	329	89%
Family Use	306	83%
Business Use (Per Part 95 Rules)	24	6%
Travel Use	226	61%
Hobby Use	198	54%
Other	84	23%

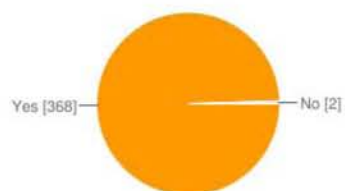
People may select more than one checkbox, so percentages may add up to more than 100%.

Should a license be required for GMRS?



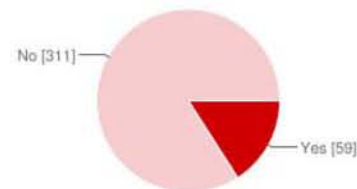


**Should repeaters be allowed on GMRS?**



Yes	368	99%
No	2	1%

Should businesses be allowed to use GMRS frequencies?



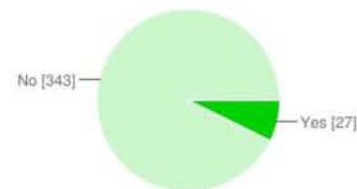
Yes	59	16%
No	311	84%

Should portable radios be restricted to 2 Watts ERP (Effective Radiated Power)?



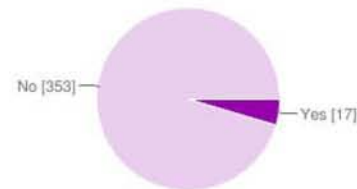
Yes	20	5%
No	350	95%

Should the other station types be restricted to lower output power?



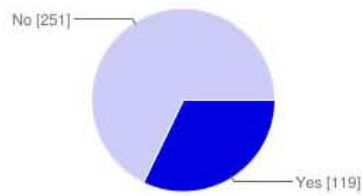
Yes	27	7%
No	343	93%

Should there be antenna height restrictions?



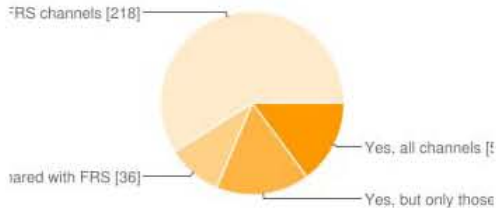
Yes	17	5%
No	353	95%

Should GMRS be transitioned to 12.5 kHz narrowband?



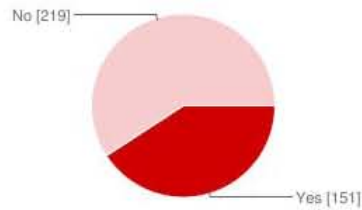
Yes	119	32%
No	251	68%

Should GPS data bursts be allowed on GMRS channels?



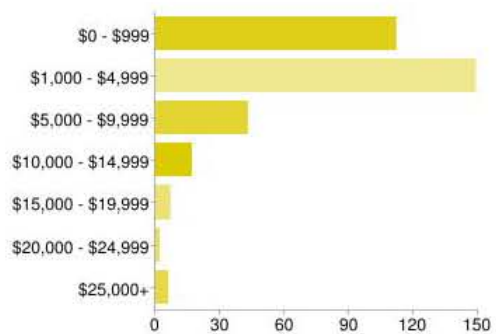
Yes, all channels	55	15%
Yes, but only those channels shared with FRS	61	16%
Yes, but only certain primary channels and those shared with FRS	36	10%
No, only on FRS channels	218	59%

Should Section 95.29(g) be deleted from the current rules?



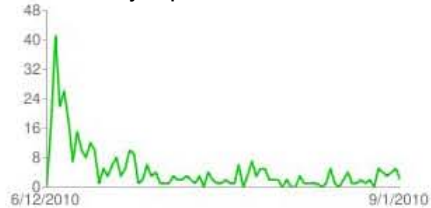
Yes	151	41%
No	219	59%

How much do you have invested in your GMRS equipment?



\$0 - \$999	112	30%
\$1,000 - \$4,999	149	40%
\$5,000 - \$9,999	43	12%
\$10,000 - \$14,999	17	5%
\$15,000 - \$19,999	7	2%
\$20,000 - \$24,999	2	1%
\$25,000+	6	2%

Number of daily responses



## Comments for FCC NPRM 10-106 (Part 95 Services)

This form is used to survey GMRS licensees regarding the FCC's Notice of Proposed Rule Making dated June 7, 2010. It aims to change the Part 95 rules which include those pertaining to FRS and GMRS. A formal response will be filed by myGMRS.com on behalf of all GMRS licensees. Your comments here will be sent along with the response for the FCC to consider.

\* Required

### Your GMRS Callsign \*

For your answers to be considered, please provide your valid callsign.

### Do you own a GMRS repeater? \*

- ☐ Yes, I own a fixed GMRS repeater.
- ☐ Yes, I own a mobile GMRS repeater.
- ☐ No, I do not own a repeater.

### Do you use any other GMRS repeaters? \*

Do not count repeaters which you currently own.

- ☐ Yes
- ☐ No

### For which purposes do you use GMRS? \*

Check all that apply.

- ☐ Personal Use
- ☐ Family Use
- ☐ Business Use (Per Part 95 Rules)
- ☐ Travel Use
- ☐ Hobby Use
- ☐ Other:

### Should a license be required for GMRS? \*

Please read all answers carefully.

- ☐ Yes, for all stations
- ☐ Yes, except portable stations
- ☐ Yes, except portable and mobile stations
- ☐ Yes, except portable, mobile, and small base stations
- ☐ Yes, except portable, mobile, small base, and base stations
- ☐ No, for all stations

**Should you be required to identify your station (using your callsign)? \***

Please read all answers carefully.

- ☐ Yes, for all stations
- ☐ Yes, except portable stations
- ☐ Yes, except portable and mobile stations
- ☐ Yes, except portable, mobile, and small base stations
- ☐ Yes, except portable, mobile, small base, and base stations
- ☐ No, for all stations

**Should there be an age requirement to obtain a license? \***

Currently a licensee must be 18 years old. There is no age requirement for Amateur Radio.

- ☐ Yes
- ☐ No

**If licenses are still required, should the term be extended from 5 years to 10 years? \***

- ☐ Yes
- ☐ No

**Should repeaters be allowed on GMRS? \***

Currently repeaters are allowed as long as the owner has a valid GMRS license.

- ☐ Yes
- ☐ No

**Should businesses be allowed to use GMRS frequencies? \***

Currently businesses can only use GMRS if each radio user obtains his or her own license. So in most cases, businesses are not allowed to use GMRS.

- ☐ Yes
- ☐ No

**Should portable radios be restricted to 2 Watts ERP (Effective Radiated Power)? \***

Currently portable radios fall into the mobile radio category and are restricted to 50 Watts with no limit on ERP.

- ☐ Yes
- ☐ No

**Should the other station types be restricted to lower output power? \***

Currently small base stations are allowed 5 Watts, fixed stations are allowed 15 Watts, while base, mobile, and repeater stations are allowed 50 Watts.

- ☐ Yes
- ☐ No

**Should there be antenna height restrictions? \***

Currently there are no antenna height restrictions except for small base stations.

- ☐ Yes
- ☐ No

**Should GMRS be transitioned to 12.5 kHz narrowband? \***

Currently GMRS channels are 25 kHz wideband. Part 90 radio services are moving to 12.5 kHz channels.

- ☐ Yes
- ☐ No

**Should GPS data bursts be allowed on GMRS channels? \***

Garmin has a waiver to allow GPS data bursts of less than 1 second on FRS channels. GMRS is now being considered as well.

- ☐ Yes, all channels
- ☐ Yes, but only those channels shared with FRS
- ☐ Yes, but only certain primary channels and those shared with FRS
- ☐ No, only on FRS channels

**Should Section 95.29(g) be deleted from the current rules? \***

- ☐ Yes
- ☐ No

**How much do you have invested in your GMRS equipment? \***

Realistic estimates only. Please include all radios, programming gear, antennas, repeaters, and anything else related to GMRS.

- ☐ \$0 - \$999
- ☐ \$1,000 - \$4,999
- ☐ \$5,000 - \$9,999
- ☐ \$10,000 - \$14,999
- ☐ \$15,000 - \$19,999
- ☐ \$20,000 - \$24,999
- ☐ \$25,000+

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